

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

UNITED STATES OF AMERICA)	
Appellee,)	
)	
vs.)	DOCKET NO. 15-4057
)	
BRIAN DAVID HILL,)	
Appellant.)	
)	

AMENDED MOTION TO WITHDRAW

NOW COMES the undersigned counsel for Appellant Brian David Hill, Mark A. Jones, Esq., hereby moving this Honorable Court to withdraw from this matter and to be relieved of the responsibility of filing a petition for certiorari. In support, the undersigned shows unto the Court the following.

1. The undersigned was appointed pursuant to the Criminal Justice Act on February 5, 2015.

2. The government moved to dismiss the appeal as untimely and the undersigned filed a response opposing the dismissal of the case. Today, April 7, 2015, this Court granted the government's motion to dismiss the appeal and affirmed the decision of the district court not to extend the time for filing an appeal.

3. Undersigned filed a Certiorari Form today, April 7, 2015.

4. After a careful and thorough review of the issues presented in this appeal, the undersigned has formed the opinion that a petition for a writ of certiorari would be frivolous.
5. A copy of this motion has been served on Appellant, and he has been notified of his right to file a response to this motion within seven (7) days.
6. The undersigned does hereby state that he has advised the appellant in writing of his right to seek review in the U.S. Supreme Court on his own behalf, without an attorney.

WHEREFORE, the undersigned appointed counsel respectfully requests that he be allowed to withdraw from this matter and that he be relieved of the responsibility of filing a petition for certiorari in this matter.

RESPECTFULLY SUBMITTED, this the 13th day of April, 2015.

/s/Mark A. Jones

BELL, DAVIS & PITT, P.A.

Attorney for Appellant

North Carolina Bar # 36215

100 N. Cherry St, Suite 600

Winston-Salem, NC 27101

Phone:(336)714-4122

Facsimile:(336)714-4101

Mjones@belldavispitt.com

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the above upon Appellant Brian Hill by sending copy, certified mail, return receipt requested to him at the following address:

Brian David Hill
916 Chalmers St. Apt D
Martinsville, VA 24112

This the 13th day of April, 2015

/s/ Mark A. Jones
BELL, DAVIS & PITT, P.A.
Attorney for Defendant
North Carolina Bar # 36215
100 N. Cherry St, Suite 600
Winston-Salem, NC 27101
Phone:(336)714-4122
Facsimile:(336)714-4101
Mjones@belldavispitt.com